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INDEPENDENT REGULATORY
REVIEW COMMISSION

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March 21, 2007 TDD/TYY Hearing Impaired (610) 252-3786

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Mr. James Buckheit, Director
State Board of Education
333 Market Street
Harrisburg, PA 17126-0333

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PA. STATE BOARD
OF EDUCATION

Dear Mr. Buckheit:

We are writing on behalf of Colonial Intermediate Unit 20, its member districts and vocational-technical schools in Northampton, Monroe and Pike Counties in Pennsylvania. We would like to express our collective thoughts regarding Chapter 49-2 and some of our concerns regarding portions of the regulations that impact our staffing needs and proposed regulations that may restrict us in our delivery of services to our students.

We respectfully submit our position and suggestions for your consideration on the following issues:

49.1 Definitions

Educational Specialist – Good enhancement of definition with examples

49.13 (i) – Policy

The requirements help to support better preparation of teachers to deal with diverse learner needs. Restructuring of college and universities in their teacher education process and coursework is at the root of the success of our teacher training programs. Without major changes, we believe colleges and universities will basically produce obsolete teachers. In regard to the required 9 credits, we would suggest that you try to combine some of these areas of study into the general education courses. We also would like to suggest that some of these 9 credits could become post baccalaureate courses to be taken as part of the requirements for permanent certification. Although we believe teachers should come to us well prepared to teach in all areas, we do understand that the colleges and universities have a lot of requirements that must be met in four years. Requiring these continuing areas of focus after the obtainment of an initial certification may give candidates an opportunity to professionally grow in these three areas in their early years as practitioners.

Although we feel some flexibility should remain with the colleges and universities, if you continue to require the 9 credits, we would like you to be more specific to clarify how many credits must be taken in instruction in literacy skills development and cognitive development for students with disabilities (example 3 credits or 90 hours and 3 credits or 90 hours) as you did with ELL.

Of course we would like better-prepared teachers sooner than January 1, 2010, but understand we need to allow for years of change and implementation.

49.16 – Induction

(a) Adding induction for pre-kindergarten programs makes good sense as these teachers provide the foundation for student growth.

(b) We would appreciate written guidelines to help uniformity as teachers move between entities. This may include guidelines for content requirements and hours. However, the determination of these guidelines should be made in conjunction with practitioners and based on research and pragmatics in the field. We also asked that in these guidelines you allow a portion of the induction program to be individualized to meet the needs of the district and to deal with local issues.

(d) This is better/stronger language. Schools continue in induction what colleges and universities taught as a foundation.

49.17 - We have a general concern about our certificated employes being able to meet the requirements of the new continuing professional education guidelines. 49.17 (a) states that schools must submit to the Secretary for approval a three-year professional educational plan as part of its strategic plan. However the Act 48 guidelines state that the plan must be reviewed each year. We think the guidelines should match the regulations.

(7) Continuing education is always important. Our concern is how extensive this requirement will be and what will be the additional cost to the district.

49.62b – Program Endorsement Certificates

These endorsements will be helpful to school districts when hiring candidates for specialty areas. However, we would encourage that colleges and universities continue to put as much course content in these areas as possible in their preparation programs so new teachers come to school districts with basic skills in these areas.

49.83 (3) - We appreciate that the department will guide new teachers in their requirements for permanent certification. We would suggest it may be valuable to have graduates beginning in 2008 meet these requirements so they could be better assisted to meet content requirements to become highly qualified under IDEA flexibility and become better qualified to deliver instruction to diverse learners. To promote this compliance, we encourage the Department to send these requirements to candidates when they mail them their certificate and information regarding requirements to keep their certificate valid and active.

49.85 (b) - The new special education certification requirements limit our current staffing flexibility and appear to require an expansion of staff to cover all of the grade levels. It also limits our ability to transfer regular education and special education teachers to different grade levels. This section limits us tremendously and will cause very complex staffing issues in already large shortage area in the State of Pennsylvania.

Additionally, we are concerned about the impact of this section concerning the staffing practices in smaller districts.

Mr. James Buckheit

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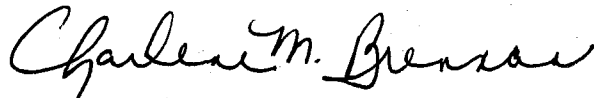
In numbers 49.85 (b) 1 through 8, we would like you to change the language of grades _____ through _____ or ages _____ through _____ to grades _____ through _____ and/or ages _____ to _____. This would give a bit more flexibility in moving our staff members as we are greatly concerned as to how we are going to staff classrooms under these regulations in the future. We are also concerned with how this conforms with Chapter 14. Adding more flexibility will help.

49.85 (d) - Although we are glad the Secretary can grant exceptions, we are concerned as we staff classrooms and have immediate needs that it will take too long to get approval in time to cover classrooms. If the secretary is going to outline circumstances under which exceptions will be granted, we would suggest that superintendents follow these guidelines and issue their own exceptions or at least for a temporary time while we wait for approval.

49.85 (f) (1) (2) (3) Although we like the flexibility for the Secretary to grant exceptions, we are extremely concerned with "turn around time" due to the number of exceptions that may need to be reviewed. Perhaps there is a way to develop guidelines and delegate this to school leaders.

Thank you for allowing us the opportunity to share our concerns and ideas which we feel will help to strengthen the Chapter 49 regulations. Our districts, vocational-technical schools and the Intermediate Unit work diligently and devote a large portion of our finances to recruit, hire and retain the best teachers for our students. Although we understand that novice teachers require careful supervision, on-going professional support and training, we believe that much more focus and higher expectations by the state should be devoted to the proper pre-certification training and development of new teachers in our colleges and universities. This will ensure that all of our children receive the very best teacher to guide and enhance their growth and learning.

Respectfully,



Dr. Charlene Brennan
Executive Director

mns

Colonial Intermediate Unit 20 and Member School Districts

John F. Reinhart

John F. Reinhart, Superintendent
Bangor Area School District

4/10/07

Date

Robert M. Lewis for Dr. Joseph A. Lewis

Dr. Joseph A. Lewis, Superintendent
Bethlehem Area School District

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Date

Dr. Candis M. Finan

Dr. Candis M. Finan, Superintendent
Delaware Valley School District

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Rachael R. Heath

Rachael R. Heath, Ph.D., Superintendent
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Victor D. Lesky

Dr. Victor D. Lesky, Superintendent
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Linda J. Firestone

Dr. Linda J. Firestone, Superintendent
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Dr. William E. Haberl, Superintendent
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Ron Meyer

Mr. Ron Meyer, Interim Superintendent
Stroudsburg Area School District

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Date

Douglas Wagner

Douglas Wagner, Superintendent
Wilson Area School District

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Date